



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

Russell L. Hirschhorn  
Member of the Firm  
d +1.212.969.3286  
f 212.969.2900  
rhirschhorn@proskauer.com  
www.proskauer.com

July 20, 2022

**By ECF and Email**

The Honorable Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007

USDC SDNY  
DOCUMENT  
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Re: Pecou v. Bessemer Trust Company et al., Case No. 22-cv-1019-MKV (S.D.N.Y.)

Dear Judge Vyskocil:

We represent Defendants Bessemer Trust Company (“Bessemer”) and the Profit-Sharing Plan Committee of Bessemer Trust Company (collectively, “Defendants”) in the above-referenced action.

Pursuant to Section 9 of Your Honor’s Individual Rules of Practice in Civil Cases, Defendants respectfully request that the Court accept a redacted version of Exhibit A to the Declaration of Joseph E. Clark that was filed earlier today in support of Defendants’ Opposition to Plaintiff’s Motion for Leave to Amend the Complaint. We have also filed contemporaneously herewith, under seal, Mr. Clark’s Declaration and Exhibit A thereto, highlighting the proposed redactions. Defendants request to redact the name and home address of a former employee of a Bessemer affiliate—who is not a party to this action—for privacy reasons. The proposed redactions are limited to what is necessary to protect the individual’s interests in keeping this information confidential. *See, e.g., City of Almaty, Kazakhstan v. Ablyazov*, No. 15-cv-5345, 2021 WL 1177737, at \*3 (S.D.N.Y. Mar. 29, 2021) (permitting redaction of individual’s home address in light of “[c]ompelling privacy interests”).

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ *Russell L. Hirschhorn*

Russell L. Hirschhorn

cc: All counsel of record

**Granted. SO ORDERED.**

Date: 8/9/2022

New York, New York

*Mary Kay Vyskocil*  
Mary Kay Vyskocil  
United States District Judge